

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Civil Action No. 2:23-cv-00641-JRG-RSP

JURY DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME TO FILE PROPOSED
DOCKET CONTROL ORDER, DISCOVERY ORDER, AND PROTECTIVE ORDER**

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”), (collectively, the “Parties”) file this Joint Motion for Extension of Time to File Proposed Docket Control Order, Discovery Order, and Protective Order.

The current deadline for the Parties to file their proposed docket control order and discovery order is June 19, 2024, and the deadline to file the protective order is June 20, 2024. June 19, 2024 is a federal holiday. The Parties have also continued to cooperate to diligently prepare these materials, working to reach agreement, and respectfully request a brief extension of time to finalize these materials. This extension is not sought for prejudice or delay, but for good cause and so that justice may be served.

Accordingly, the Parties respectfully request that the Court extend the deadline for filing their proposed docket control order, discovery order, and protective order by about one week to June 26, 2024.

Dated: June 19, 2024

Respectfully submitted,

By: /s/ Jason Wietholter
Jason Wietholter

By: /s/ Sara C. Fish
Sara C. Fish

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SAMSUNG ELECTRONICS AMERICA,
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 19th day of June 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Sara C. Fish

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Sara C. Fish